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ROBERT B. FRAIDENBURGH

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

IMPRIMIS INTERNATIONAL, INC.

Plaintiff,

vs.

ROBERT B. FRAIDENBURGH,

Defendant.

CASE NO. CIV.S-04-1297 FCD DAD

**STIPULATION**

Trial Date: November 15, 2005

IT IS HEREBY AGREED to and STIPULATED by and between the attorneys for Plaintiff IMPRIMIS INTERNATIONAL, INC. and Defendant ROBERT B. FRAIDENBURGH that Section IV of the Status (Pretrial Scheduling) Order be modified to provide that all discovery be completed by June 30, 2005.

The following demonstrates "good cause" as required for modification of the Status Order:

1. On April 18, 2005, Defendant noticed the depositions of Plaintiff's person most knowledgeable and Ben Hord (an employee of Plaintiff). The deposition notices provide that the depositions will take place on May 9, 2005.

2. Plaintiff's counsel is participating a trial in Virginia which will be taking place from May 2, 2005 through May 9, 2005.

3. Ben Hord, who will be designated as Plaintiff's person most knowledgeable will be in Thailand until May 24, 2005.

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1           4.       Plaintiff and Defendant are continuing to informally resolve outstanding discovery  
2 disputes relating to the Defendant's First Set of Special Interrogatories.

3           5.       Plaintiff and Defendant have agreed that the deposition of Plaintiff's person most  
4 knowledgeable and Ben Hord will take place on June 7, 2005.

5           In sum, the parties hereby Stipulate and Agree that based upon the foregoing, good cause  
6 exists to modify Section IV of the Status Order to provide that all discovery be completed by June  
7 30, 2005.

8           WHEREFORE, Plaintiff and Defendant hereby stipulate and request that the May 12, 2005,  
9 close of discovery date be vacated and that the Status Order be modified to provide that all discovery  
10 be completed by June 30, 2005.

11           IT IS SO STIPULATED.

12  
13 Dated: \_\_\_\_4/21/2005\_\_\_\_.

\_\_\_\_\_/s/  
Shawn M. Krogh  
Attorney for Defendant ROBERT B.  
FRAIDENBURGH

14  
15  
16  
17 Dated: \_\_\_\_4/21/2005\_\_\_\_.

\_\_\_\_\_/s/  
Stephen A. Bamberger  
Attorney for Plaintiff IMPRIMIS  
INTERNATIONAL, INC.

**PROPOSED ORDER**

WHEREFORE, based upon a finding of good cause, the Court hereby vacates that May 12, 2005, close of discovery date.

IT IS FURTHER ORDERED that the Status Order be modified to provide that all discovery be completed by June 30, 2005.

IT IS FURTHER ORDERED in light of the extension of the discovery completion date the court moves the following deadlines: all disposition motions shall be heard no later than September 9, 2005. The final pretrial conference is RESET to Friday, December 9, 2005 at 2:30 p.m. The Joint Pretrial Statement shall be filed on or before December 2, 2005. The jury trial is RESET to Tuesday, February 28, 2006 at 9:00 a.m.

DATED: May 12, 2005

/s/ Frank C. Damrell Jr.  
FRANK C. DAMRELL JR.  
United States District Judge

**COURT:** *United States District Court, Eastern District of California*  
**CASE NO.:** *CIV. S-04-1297 FCD DAD*  
**CASE NAME:** *Imprimis International, Inc. v. Robert B. Fraidenburgh*

PROOF OF SERVICE

I am a citizen of the United States, employed in the County of Sacramento. My business address is 601 University Ave, Suite 250, Sacramento, California 95825. I am over the age of 18 years and not a party to the above-entitled action.

I am familiar with Radoslovich Law Corporation's practice whereby each document is placed in an envelope, the envelope is sealed, the appropriate postage is placed thereon and the sealed envelope is placed in the office mail receptacle. Each day's mail is collected and deposited in a U.S. mailbox at or before the close of each day's business.

On the date indicated below, I served the within:

**STIPULATION**

BY MAIL---

Placed in the United States Mail at Sacramento, California, a true copy in a sealed envelope with first class postage affixed and mailed as follows:

BY FAX AND MAIL---

I personally sent to the addressee's telecopier number a true copy of the above described document(s), and verified said transmission. Thereafter, I placed a true copy in a sealed envelope with first class postage affixed and mailed as follows:

BY PERSONAL SERVICE---

By causing delivered by hand to the addressee addressed as follows:

BY FEDERAL EXPRESS - - -

By causing delivery by Federal Express of the document(s), before the time due for pick-up, addressed as follows:

Stephen A. Bamberger  
1529 Old Bridge Road, Suite 2  
Woodbridge, VA 22192  
Facsimile: (703) 499-9809

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration is executed on May 10, 2005, at Sacramento, California.

Sarah J. Goodness

/s/